Comments of

COALITION FOR SAFE BUILDING MATERIALS

(California Pipe Trades Council, California Professional Firefighters, Consumer Federation of California, Planning and Conservation League, Center for Environmental Health, Sierra Club of California and Communities for a Better Environment)

on the

DRAFT ENVIRONMENTAL IMPACT REPORT FOR

ADOPTION OF REGULATIONS PERMITTING STATEWIDE
RESIDENTIAL USE OF CHLORINATED POLYVINYL CHLORIDE (CPVC)
PLASTIC PLUMBING PIPE WITHOUT FIRST MAKING A FINDING OF
POTENTIAL PREMATURE METALLIC PIPE FAILURE DUE TO LOCAL
WATER OR SOIL CONDITIONS
STATE CLEARINGHOUSE NO. 2006012044

VOLUME I

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September 14, 2006

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> > Re: <u>Draft Environmental Impact Report on Statewide Approval of CPVC;</u> <u>State Clearinghouse No. 2006012044</u>

Dear Ms Gilb:

The following comments on the Draft Environmental Impact Report on Statewide Approval of CPVC, State Clearinghouse No. 2006012044, are respectfully submitted on behalf of the Coalition for Safe Building Materials ("Coalition"). The members of the Coalition include the California Pipe Trades Council, California Firefighters Association, Consumer Federation of California, Planning and Conservation League, Center for Environmental Health, Sierra Club of California and Communities for a Better Environment, along with their individual members.

The Coalition's comments also include and incorporate by reference the expert comments of Dr. Petra Pless, Thomas Reid of TRA Environmental Sciences, Inc., and Dr. Jim Bellows. These comments also reference a number of supporting technical documents that are submitted as separately bound appendices. The supporting appendices are also incorporated by reference and hereby made a part of the comments of the Coalition.

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We thank you and the Department for this opportunity to comment.

Sincerely,

Thomas A. Enslow

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TAE:bh